



Air Logistics, L.L.C.

February 25, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board
Washington, DC 20594

RE: Air Logistics LLC Response to NTSB Notice of Proposed Rulemaking (NPRM 427)

Mr. Joshi,

Air Logistics LLC believes that there is limited value of the NTSB Notice of Proposed Rulemaking (NPRM 427) posted in the Federal Regulation pages 77150 to 77153 on December 27, 2004, that proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

Presently, when a ground strike of a rotor blade occurs that damages the rotor blade but nothing else on the aircraft and no one is injured, the event is called an incident. This is due to the present exemption in the "substantial damage" for the purpose of reporting. The NPRM removed the blade strike damage exemption, thus ground strike damage becomes "substantial damage" and therefore is an "accident".

The rotor blade strike reclassification causes a helicopter operator to have more accidents on his record. His safety record is valuable to him especially in the highly competitive environment of today.

If the blade is removed for strike damage and is repaired, it can go back on a helicopter for the remainder of its useful life – why is this an accident? This deletion of "rotor blade" from the ground strike exemption of the substantial damage definition does not make sense and will cause many requests for reclassification back to an incident.

The proposed change in 830.2 to eliminate ground rotor strikes from the exemption portion of the definition of "substantial damage" is not appropriate, and is strongly opposed. These incidents are being reported to the NTSB now and no field investigations are occurring. This proposed regulatory change would increase the number of accidents and increase costs to the operators with no significant safety gain.

RECOMMENDATION: Air Logistics LLC recommends that there be NO change to the 14 CFR 830.2 definition of "substantial damage".

Sincerely,

Mark Fontenot
Chief Pilot

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